THE PARK LAW GROUP, LLC

Attorneys for Plaintiff The Dong-A Ilbo Chull S. Park, Esq. (No. 202681) 23 S. Warren Street 2nd Floor Trenton, New Jersey 08608

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

THE DONG-A ILBO,

Plaintiff,

Civil Action No. 08-2399 (GP)

v.

BO H. LIM, et al.,

Defendants.

ECF CASE

NOTICE OF MOTION
TO MODIFY THE ORDER
ENTERED ON SEPTEMBER 15,
2009 AND LIFT THE STAY AS TO
NON-DEBTOR DEFENDANTS

PLEASE TAKE NOTICE that the undersigned attorney of record for the plaintiff, The Dong-A Ilbo ("Plaintiff"), will move this Court for an order modifying the Order entered on September 15, 2009 as to the defendants, Kook Jin Lee, The Korean Daily Tribune, Inc., et al., The Korean Southeast News, Inc., et al., and STV Networks, Inc. (collectively "Non-Debtor Defendants"), in this matter and lifting the stay as to the Non-Debtor Defendants, on a date and time to be determined by the Court.

PLEASE TAKE FURTHER NOTICE that Plaintiff will rely on this notice of motion and the Memorandum of Law in Support of the Motion to Modify the Order entered on September 15, 2009 and Lift the Stay as to Non-Debtor Defendants.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached.

PLEASE TAKE FURTHER NOTICE that an oral argument is requested if this motion is opposed.

THE PARK LAW GROUP, LLC

Attorneys for Plaintiff
The Dong-A Ilbo

Bv:

Chull S. Park (No. 202681)

Date: January 28, 2010

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